



INTERNATIONAL FINANCE

AND

INVESTMENT

1985 - 86

IAN F.G. BAXTER

NOTE: This book is intended only to provide introductory materials on certain topics within the range of International Finance and Investment. It is not intended to be comprehensive, or to be a substitute for research. It can assist in the selection of a topic for a research project, and as a possible start-up in planning a project.

LAW LIBRARY

AUG 22 1985

FACULTY OF LAW
UNIVERSITY OF TORONTO

INTERNATIONAL FINANCE

AND

INVESTMENT

1985 - 86 ✓

IAN F.G. BAXTER

NOTE: This book is intended only to provide introductory materials on certain topics within the range of International Finance and Investment. It is not intended to be comprehensive, or to be a substitute for research. It can assist in the selection of a topic for a research project, and as a possible start-up in planning a project.



Digitized by the Internet Archive
in 2018 with funding from
University of Toronto

https://archive.org/details/internationalfin00baxt_0

INTERNATIONAL FINANCE AND INVESTMENT

TABLE OF CONTENTS

	<u>PAGE</u>
CHAPTER I: FOREIGN EXCHANGE	
Section i: Markets and Practice	I-1
Section ii: Currency & Interest Swaps	I-6
Section iii: Court Judgments	I-7
CHAPTER II: INTERNATIONAL MONEY AND BOND MARKETS	
Section i: Eurocurrency Markets	II-1
Section ii: Eurobond Markets	II-3
CHAPTER III: INTERNATIONAL FINANCIAL INSTITUTIONS	
Section i: Bank for International Settlement	III-1
Section ii: Group of Ten	III-1
Section iii: International Monetary Fund	III-2
Section iv: World Bank	III-8
CHAPTER IV: SYNDICATED LOANS	
Section iii: International Syndicated Loans	IV-1
CHAPTER V: PROJECT FINANCING	
Part A: Project Financing	V-1
Part B: International Applications	V-4
CHAPTER VI: ELEMENTS OF INTERNATIONAL AND COMPARATIVE INCOME TAX	
Introduction	VI-1
Canada	VI-8
France	VI-17
Federal Republic of Germany	VI-29
Hong Kong	VI-38
Japan	VI-43
Netherlands	VI-48
Singapore	VI-53
United Kingdom	VI-59
United States	VI-65

PAGE

CHAPTER VII: TRANSNATIONAL ACQUISITIONS

Section i:	Foreign Investment Legislation	VII-1
Section ii:	A U.S. Acquisition: Some Fiscal Aspects	VII-4
Section iii:	An Acquisition in Brazil: Some Fiscal Aspects	VII-13

CHAPTER VIII: PETROLEUM INDUSTRY

Structure of the Canadian Petroleum Industry:

Introduction: The Extent of Foreign Control	S1-1
Ownership and Vertical Integration	S1-4
Exploration and Production	S1-6
Pipelines: Oil	S1-9
Gas	S1-13
Refining and Processing: Oil	S1-15
Natural Gas Processing	S1-19
Marketing: Heating Oil	S1-22
Gasoline	S1-25

The National Energy Program:

Introduction and Background	I-1
Energy Dependence	I-2
Revenue Sharing	I-3

Canadianization

Introduction	II-1
Government Ownership	II-1
Canadian Ownership and Control	II-1

Taxation

Background and Pre-NEP Tax Structure	III-1
(a) Income Taxes	III-2
(b) Provincial Royalties	III-7
Taxation Under the NEP	III-9
Petroleum and Gas Revenue Tax	III-9
Production Royalty Tax	III-10
Resource Royalty Tax	III-10
Natural Gas and Gas Liquids Tax	III-11
Petroleum Compensation Charge	III-11
Depletion Allowances	III-12
Canadian Exploration Expense	III-13
Canadian Ownership Tax	III-14

Petroleum Incentives Program

Introduction	IV-1
Phase Out of Depletion Allowances	IV-1
Petroleum Incentives Program	IV-2

	<u>PAGE</u>
Pricing	
Oil Pricing	V-1
(a) Background	V-1
(b) Blended Price System	V-2
(c) Prices for Domestic Oil Production	V-3
Natural Gas Pricing	V-4
Pricing Agreements	V-4
Other Aspects of the NEP	VI-1
Oil Substitution and Conversion	VI-1
Pipeline Extensions	VI-1
Refinery Modifications	VI-2
A New Government	VI-3

